Commissioners:

I have been an amateur radio operator since 1963, have held an extra class license since the mid 70's, and had qualified as a volunteer examiner (VE) in the 80's. I am in favor of *keeping* Element 1 in the rules.

The statement of the petitioner that, "The Amateur Service community suffers from the loss to its ranks of a large number of potentially excellent operators who are turned away because of the CW requirement," is misleading. If these ones we are losing have such a potential for excellence, why won't they bother to learn the code? Are there indeed "large numbers" of these "potentially excellent operators" who cannot realize some of their potential in this mode?

The Amateur Radio Service requires some demonstrated knowledge and discipline to enter it. One doesn't have to be a "rocket scientist" in electronics to pass the test, but we do have some "rocket scientists" in our ranks. Similarly, we have some excellent high speed Morse operators, but currently all one needs to know is 5 wpm to pass the test. Duh! Twenty six letters in the alphabet, ten numerals, and some punctuation. Yep, all those potentially excellent operators will just balk at that requirement. Little kids have done it in droves. The petitioners are making a mountain out of a molehill.

The NCVEC claims there is "no longer any reasonable justification for requiring an applicant to demonstrate this antiquated skill." Maybe somebody should clue in the manufacturers of the multiband HF rigs, virtually all of which include CW capability, that this mode is antiquated, so they can build cheaper rigs without it. AM is antiquated in the Amateur Service; therefore only some of the fancy HF rigs include it. But AM is alive and well in the Shortwave Broadcast Service. But an SWL rig may not have a BFO, as CW is becoming antiquated in many services and may not be desired in short wave listening. Similarly AM operation is not the most popular feature of ham rigs, while CW operation is a feature sine qua non.

Knowledge of CW is a hurdle, not a barrier. Economics is sometimes a barrier, which can be overcome by inexpensively priced low power CW rigs, but not with fancier SSB rigs. I have been in a position of operating such a CW rig, modified to include part of some phone bands, and checking in to a SSB traffic/public-service net, where the net control station was operated by that rare ham who had completely forgot the code. I could still check in because we had a whole roll call of hams listening who knew the code, willing to help. If this measure gets passed, I can see trying to do that in a net comprised of a roll of code-ignorant "potentially excellent [CW] operators" who can't copy me because they were never required to learn the code, looking for the odd ham who is CW literate.

This reasoning is given in greater detail in the paper by Andrew Ross, ZS1AN, which I am including with this submission, rather than trying to restate it all myself. Please consider his arguments which apply as well to our country as they do to his.

Sincerely, Earl S. Gosnell III

www.qsl.net/zslan/morse.htm